

UNITED STATES DISTRICT COURT

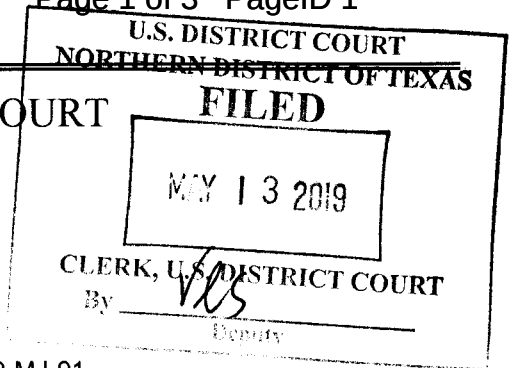
for the
Northern District of TexasUnited States of America
v.

Assmir Contreras-Martinez (01)

Defendant(s)

Case No.

2:19-MJ-91

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 11, 2019 in the county of Oldham in the
Northern District of Texas, the defendant(s) violated:*Code Section**Offense Description*Title 21, United States Code,
Sections 841(a)(1) and 841(b)(1)(A)
(ii).

Possession with Intent to Distribute 5 kilograms or More of Cocaine

This criminal complaint is based on these facts:

see attached affidavit in support of complaint.

☒ Continued on the attached sheet.*Taylor Hawkins**Complainant's signature*

Taylor Hawkins, DEA TFO

Printed name and title

Sworn to before me and signed in my presence.

Date: 5-13-19*Lee Ann Reno**Judge's signature*City and state: Amarillo, Texas

Lee Ann Reno, U.S. Magistrate Judge

Printed name and title

Case No. 2:19-MJ-91

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Taylor P Hawkins, being duly sworn, depose and state:

1. I am a Task Force Officer assigned to the Drug Enforcement Administration (DEA) in Amarillo, Texas. I have been employed with Texas Department of Public Safety 11 years.

2. As part of my duties as a Task Force Officer, I investigate criminal violations related to narcotics trafficking and illegal drug smuggling. I have been involved in several investigations of illegal contraband and have specialized training and knowledge in investigating the illicit smuggling, transportation, and trafficking of narcotics in violation of Title 21, United States Code, Section 841(a)(1).

3. This affidavit is made in support of a complaint and arrest warrant for CONTRERAS-MARTINEZ, Assmir, I am familiar with the information contained in this affidavit based upon my own personal investigation, as well as conversations with other law enforcement officers involved in this investigation.

4. On 05/11/2019 Texas DPS trooper Kyle Kieth was east bound on Interstate 40 in Oldham County at approximately the 41 mile post when a 2007 Ford Explorer Sport Track bearing Arizona AC72760 almost rear ended him. Trooper Kieth affected a traffic stop for following too close and change lane when unsafe (both violations of the Texas Traffic Code). Trooper Kieth identified the driver as Contreras-Martinez, Assmir, of Tucson, Arizona. During road side interview Trooper Kieth noticed several criminal indicators. Trooper Kieth asked for and was granted consent. A search of the vehicle yielded 3 deep concealment traps. One in the bed of the vehicle, one in the rear interior panel which was operated by a make shift trunk latch, and one in the floor of the vehicle. Located in the three traps was approximately 33 bundles of suspected cocaine.

5. DEA TFO Kerry Blackerby responded to the scene along with Texas DPS CID Agent Damon Samford and Randall County CID Marcos Fabela. A Mirandized and recorded interview was conducted with Contreras-Martinez, in which he stated he knew he was transporting illegal contraband, and he was being paid \$6000 to do so. Contreras-Martinez later admitted this was his second trip. Contreras-Martinez stated his first trip he picked up at Los Angeles, California, at an unknown location, and delivered to a Motel 6 beside the Miami International Airport in Miami, Florida. Contreras-Martinez stated for this trip he traveled to San Diego, California, and Contreras-Martinez picked the load up

at unknown motel in San Diego, California. Agents later located the address 3315 La Cienega Place, Los Angeles, California in Contreras-Martinez GPS. Contreras-Martinez stated this was one of the pickup motels but a search of this address reveals it to be a warehouse district. Contreras-Martinez advised this load was also going to Miami, Florida.

6. Contreras-Martinez stated he was making the trips because he was hard up for money since moving the United States illegally approximately seven months ago. Prior to his move Contreras-Martinez was employed eight years as a municipal police officer in Cananea, Sonora, Mexico.

7. Inside the traps were 33 bundles of a white powdery substance. TFO Kerry Blackerby, field tested one of the bundles, and it field tested positive for cocaine. The total weight of the bundles was approximately 36 kilos. This amount of narcotics is consistent with distribution, as opposed to someone's personal use.

Taylor Hawkins
Taylor Hawkins
DEA Task Force Officer

Sworn to before me, and subscribed in my presence

May 13, 2019
Date

Amarillo, Texas
City and State

Lee Ann Reno, U.S. Magistrate Judge
Name and Title of Judicial Officer

Lee Ann Reno
Signature of Judicial Officer

Anna Marie Bell
Anna Marie Bell
Assistant United States Attorney